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15      *Attorneys for Plaintiffs LT Game (Canada) Limited  
 16      and LT Game Limited*

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## UNITED STATES DISTRICT COURT

### DISTRICT OF NEVADA

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LT GAME (CANADA) LIMITED and  
 LT GAME LIMITED,

20      Plaintiffs,  
 21      vs.

22      SCIENTIFIC GAMES CORPORATION,

23      Defendant.

24      Case No.: 2:17-cv-01015 JAD-CWH

25      **MOTION TO EXTEND TIME TO FILE  
 26      PRO HAC VICE APPLICATION OF  
 27      NON-RESIDENT ATTORNEY DARIUSH  
 28      KEYHANI**

**(Third Request)**

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30      Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, Local Rule IA 6-1 and 11-  
 31 2, plaintiffs LT Game (Canada) Limited (“LT Game Canada”) and LT Game Limited (“LT Game”)  
 32 (collectively, “Plaintiff”) hereby request an order granting additional time for non-resident attorney  
 33 Dariush Keyhani, Esq. to file his Designation of Local Counsel and Verified Petition (“Verified  
 34 Petition”) in the above-captioned matter and asks the Court for an additional 30 days within which  
 35 to file the application.

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37      This Motion is based upon the below Memorandum of Points and Authorities, and the  
 38 pleadings and papers on file herein. Plaintiff submits that no hearing is required for this Motion as  
 39 Defendant has not appeared in this action.

1                   **MEMORANDUM OF POINTS AND AUTHORITIES**

2                   **I. FACTS**

3                   On April 7, 2017, Plaintiff, through its Nevada counsel, filed a Complaint in this matter.  
 4 [ECF No. 1]. Plaintiff included on the caption Mr. Keyhani's name, as well, both out of respect  
 5 to Mr. Keyhani and in anticipation of his likely eventual appearance in the matter. While Mr.  
 6 Keyhani has never actually appeared, the inclusion of his name on the Complaint triggered the  
 7 court's 45-day deadline to submit a designation of local counsel. [ECF No. 4]. Pursuant to the  
 8 Notice to Counsel Pursuant to Local Rule IA 11-2, Mr. Keyhani's Verified Petition was due on  
 9 May 25, 2017. *Id.*

10                  Subsequent to filing the Complaint, the parties began settlement negotiations. As  
 11 settlement appeared imminent, Plaintiff filed a first request to extend time to apply pro hac vice  
 12 (the "First Request") on May 25, 2017 [ECF No. 7]. This Court granted the First Request on May  
 13 26, 2017 [ECF No. 8]. On July 20, 2017, Plaintiff filed its second request to extend time to apply  
 14 pro hac vice (the "Second Request") [ECF No. 10] which was granted by this Court on July 24,  
 15 2017 [ECF No. 12]. Pursuant to that Order, this Court extended the deadline for Mr. Keyhani to  
 16 apply for pro hac vice admission to September 7, 2017. [ECF No. 12]

17                  Plaintiff now moves for a 30-day extension of the time to file Mr. Keyhani's Verified  
 18 Petition, and, respectfully, Plaintiff seeks this extension for good cause. Specifically, Plaintiff  
 19 seeks this extension because Plaintiff and defendant Scientific Games Corporation ("Scientific  
 20 Games") have reached a settlement, in principle, and because the parties and their counsel are  
 21 working on drafting and finalizing a formal, written settlement of their dispute; thus, Mr.  
 22 Keyhani's appearance in this matter would be unnecessary. Accordingly, Plaintiff respectfully  
 23 requests this court extend the deadline to submit the Verified Petition by 30 days, up to and  
 24 including **October 6, 2017**.

25                  **II. LEGAL ARGUMENT**

26                  An attorney seeking admission pro hac vice must associate with local counsel and apply  
 27 for admission "within 45 days of his or her first appearance." *See* LR IA 11-2(e). A party seeking  
 28 to extend the time with which to comply with the requirements of LR IA 11-2 must file a motion

1 “stat[ing] the reasons for the extension requested and...inform[ing] the court of all previous  
2 extensions of” time to comply with LR IA 11-2 the court has granted. *See* LR IA 6-1. Here, there  
3 are two reasons for the Court to grant this extension.

4 First, Mr. Keyhani has never “appeared” in this matter. While Plaintiff’s Nevada counsel  
5 included Mr. Keyhani’s name on the Complaint out of respect, Mr. Keyhani has not signed or  
6 filed anything in this matter, nor has he entered an appearance in court. Second, Plaintiff and  
7 Scientific Games have reached a settlement, in principle, and believe that the execution of a formal  
8 settlement agreement is imminent. Specifically, the parties are working on drafting the language  
9 in the settlement agreement and request some additional time to complete the agreement. If  
10 Plaintiff is successful in settling this matter without further litigation, Mr. Keyhani’s Verified  
11 Petition will be unnecessary. Thus, Plaintiff seeks this extension to save resources and the court’s  
12 time.

13 Accordingly, Plaintiff therefore requests this court extend the deadline for Plaintiff and  
14 Mr. Keyhani to comply with the requirements of LR IA 11-2 for 30 days [**from September 7,**  
15 **2017 to October 6, 2017**] to allow the parties time to finalize settlement of this matter and  
16 determine whether such admission will be necessary.

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### III. CONCLUSION

For the foregoing reasons, Plaintiff respectfully requests a 30-day extension of time for non-resident attorney Dariush Keyhani to submit his Verified Petition.

DATED this 31st day of August, 2017.

MCDONALD CARANO LLP

By: /s/Amanda C. Yen

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*Attorneys for Plaintiffs LT Game (Canada) Limited and  
LT Game Limited*

## IT IS SO ORDERED:

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**UNITED STATES MAGISTRATE JUDGE**

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DATED:

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I am an employee of McDonald Carano LLP, and that on the  
31st day of August, 2017, a true and correct copy of the foregoing **MOTION TO EXTEND**  
**TIME TO FILE PRO HAC VICE APPLICATION OF NON-RESIDENT ATTORNEY**  
**DARIUSH KEYHANI (THIRD REQUEST)** was electronically filed with the Clerk of the Court  
by using CM/ECF service which will provide copies to all counsel of record registered to receive  
CM/ECF notification.

/s/Jelena Jovanovic  
An employee of McDonald Carano LLP



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